REMARKS

I.   GENERAL

Claims 1-29 are rejected under 35 U.S.C. § 102(e) as being anticipated by United States Patent Application No. 10/867,930 (hereinafter "*Subramaniam*").

Claims 1-17 and 19-24 have been amended. Support for the amendments made to claims 1, 8, 14, and 21 can be found at page 5, lines 30-33, through page 7, lines 1-4, page 10, lines 11-23, and page 8, lines 13-33, through page 9, lines 1-3, of the present application. The subject matter of amended claims 2, 9, and 15 is disclosed at page 6, lines 30-32, of the application. Support for amended claims 3, 10, and 16 is found at page 8, lines 28-33, through page 9, lines 1-3. The subject matter of amended claims 4, 11, and 17 is disclosed at page 8, lines 13-22. Support for claims 5, 11-12, 19, and 22-23 can be found at page 3, lines 21-24. The subject matter of amended claims 6 is disclosed at page 10, lines 3-23. Support for the amendments to claims 7, 13, 20, and 24 can be found at page 6, lines 14-21, of the present application.

II.   ARGUMENT

The rejections of claims 1-29 should be withdrawn because *Subramaniam* fails to disclose every limitation of the claims in as complete detail as is contained in the claim. *See* MPEP § 2131 (2006) (To anticipate a claim, the reference must teach every limitation of the claim, and the identical invention must be shown in as complete detail as is contained in the claim).

A.   Claims 1-7

1.   Claim 1

Claim 1 recites "wherein the icon is selected according to a step in an automated workflow." The Examiner asserts that paragraph [0082] and Figure 26 of *Subramaniam* disclose these features of the claims. Office Action, pg. 3. The Examiner specifically asserts that paragraph [0082] and Figure 26 depict various elements in a workflow guideline that help an agent handle a customer. Office Action, pg. 3. *Subramaniam* provides no support for the Examiner's characterization of Figure 26. Figure 26 does not disclose an automated

workflow. It merely discloses interfaces for accessing the searching capability of the application disclosed by *Subramaniam*. Neither Figure 26, nor the portions of *Subramaniam* explaining Figure 26 disclose that an icon is selected according to a step of an automated workflow. *See Subramaniam,* paras. [0162]-[0164].

Paragraph [0082] also fails to disclose "wherein the icon is selected according to a step in an automated workflow." Paragraph [0082] merely discloses that server programs in the system disclosed by *Subramaniam* can be designed to perform functions including "importing and exporting data, configuring the database, executing workflow and process automation, [etc.]." Though paragraph [0082] discloses that server programs in the *Subramaniam* system may execute workflow and enforce business rules, paragraph [0082] does not disclose that the server programs select an icon in a graphical user interface according to a step of an automated workflow. Accordingly, paragraph [0082] fails to disclose the portions of claim 1 that recites "wherein the icon is selected according to a step in an automated workflow."

Claim 1 also recites "wherein a predetermined set of rules determines size, placement and visibility of the at least one managed application . . . when the icon is selected according to the step of the automated workflow." The Examiner argues that this portion of claim 1 is disclosed by paragraphs [0072], [0073] and [0082] of *Subramaniam*. Office Action, pg. 3. Paragraphs [0072] and [0073] describe the multi-layered architecture of the system disclosed by *Subramaniam*. According to these paragraphs, a user Interface layer 110 provides tools, such as applets, views, charts, and reports, associated with one or more applications, and an object manager layer, which is designed to manage business rules associated with one or more applications, provides an interface between the user interface layer and a data manager layer. Paragraphs [0072] and [0073] do not disclose the aforementioned portion of claim 1 because nothing in these paragraphs discloses predetermined rules that determine size, placement and visibility of a managed application in a graphical user interface.

Paragraph [0082] also fails to disclose "wherein a predetermined set of rules determines size, placement and visibility of the at least one managed application." Paragraph [0082] merely discloses that server programs in the system disclosed by *Subramaniam* can be designed to perform functions including "importing and exporting data, configuring the

database, executing workflow and process automation, [etc.]." Although paragraph [0082] discloses that server programs in the *Subramaniam* system may execute workflow and enforce business rules, paragraph [0082] does not disclose that the server enforces a predetermined set of rules that determines the size, placement, and visibility of a managed application. Because *Subramaniam* fails to disclose every limitation of claim 1 in as complete detail as is in the claim, the rejection of claim 1 should be withdrawn.

2.   Dependent Claims 2-7

As discussed above, independent claim 1 is not anticipated by *Subramaniam*. Claims 2-7 depend from claim 1 and inherit every limitation of claim 1. It follows that *Subramaniam* does not anticipate dependent claims 2-7 at least because *Subramaniam* does not disclose the limitations of claims 2-7 that are inherited from independent claim 1. The dependent claims also set forth subject matter making them patentable in their own right.

For example, claim 3 recites "a quickstart bar, wherein the quickstart bar includes one or more icons for identifying non-managed applications." The Examiner asserts that the limitations of claim 3 are disclosed by Figure 4 of *Subramaniam*. Office Action, pg. 4. Figure 4 merely discloses a search tool bar for facilitating searches using the application disclosed by *Subramaniam*. *Subramaniam*, paras. [0087] – [0088]. The search tool bar disclosed by Figure 4 does not include a non-managed application and, thus, cannot anticipate claim 3. Further, the Examiner has already claimed that Figure 4 discloses an icon corresponding to a managed application, *see* Office Action, pg. 3, and Figure 4 appears to disclose only one icon – the search icon. Because the "non-managed application" of claim 3 is distinct subject matter, the search icon disclosed in Figure 4 cannot refer to both managed and non-managed applications. If upon further examination the Examiner believes that the aforementioned portion of claim 3 is disclosed by *Subramaniam*, Applicant respectfully requests that Examiner point out, with particularity, what in Figure 26 Examiner believes discloses a "quick start bar" and what Examiner believes discloses "icons for identifying non-managed applications." *See* MPEP § 706.07 (2006) ("The examiner should never lose sight of the fact that in every case the applicant is entitled to a full and fair hearing, and that a clear issue between applicant and examiner should be developed . . . ."). Because *Subramaniam*

fails to disclose every limitation of dependent claims 2-7 in as complete detail as is in the claims, the rejections of claims 2-7 under 35 U.S.C. § 102(e) should be withdrawn.

B.   Claims 8-13

1.   Claim 8

Claim 8 has been amended to recite "executing an automated workflow that defines a plurality of steps for managing a customer call." This feature of claim 8 is not disclosed by *Subramaniam*. Although *Subramaniam* discloses search functionality that purportedly can be used with customer relationship software, *Subramaniam* is unconcerned with the actual handling of a customer call. Rather, *Subramaniam* discloses systems and methods for searching within a multi-layered architecture that includes multiple data sources. And although the multi-layered architecture disclosed by *Subramaniam* employs server programs can be configured to execute workflow and process automation, nothing in *Subramaniam* discloses executing an automated workflow "that defines a plurality of steps for managing a customer call."

Claim 8 also recites "wherein at least one of the icons is selected according to the corresponding step of the automated workflow." The Examiner asserts that paragraph [0082] and Figure 26 of *Subramaniam* disclose this feature of the claims. Office Action, pg. 5. The Examiner specifically asserts that paragraph [0082] and Figure 26 depict essential control applications to handle an automated workflow. Office Action, pg. 5. *Subramaniam* provides no support for the Examiner's characterization of the reference. Figure 26 does not disclose an automated workflow. Figure 26 merely discloses interfaces for accessing the searching capability of the application disclosed by *Subramaniam*. Neither Figure 26, nor the portions of *Subramaniam* explaining Figure 26 discloses that an icon is selected according to a step of an automated workflow. *See Subramaniam*, paras. [0162]-[0164]

Paragraph [0082] also fails to disclose "wherein at least one of the icons is selected according to the corresponding step of the automated workflow." Paragraph [0082] merely discloses that server programs in the system disclosed by *Subramaniam* can be designed to perform functions including "importing and exporting data, configuring the database, executing workflow and process automation, [etc.]." Though paragraph [0082] discloses that

server programs in the *Subramaniam* system may execute workflow and enforce business rules, paragraph [0082] does not disclose that the server programs select an icon in a graphical user interface according to a step of an automated workflow. Accordingly, paragraph [0082] fails to disclose the portions of claim that recites "wherein at least one of the icons is selected according to the corresponding step of the automated workflow." Because *Subramaniam* fails to disclose the limitation of claim 8 in as complete detail as is shown in the claim, the rejection of claim 8 should be withdrawn.

2.   Dependent Claims 9-13

As discussed above, independent claim 8 is not anticipated by *Subramaniam*. Claims 9-13 depend from claim 8 and inherit every limitation of claim 8. It follows that *Subramaniam* does not anticipate dependent claims 9-13 at least because *Subramaniam* does not disclose the limitations of the claims 9-13 that are inherited from independent claim 8. The dependent claims also set forth subject matter making them patentable in their own right.

For example, claim 9 recites "wherein the managed application identified by the selected icon is displayed in a separate window." The Examiner asserts that this claim, as previously presented, is disclosed "in the toolbar" of *Subramaniam*, Figure 26. Office Action, pg. 6. Nothing in Figure 26, or the written explanations of Figure 26, discloses that a managed application is displayed in a separate window, as claimed by amended claim 9. *Subramaniam* does not disclose that any information, much less a managed application, is displayed outside of the "Basic Search View" and "Basic Search Results View" disclosed by Figure 26.

C.   Claims 14-20

1.   Claim 14

Claim 14 recites "wherein one of the one or more icons is selected according to the corresponding step of the automated workflow." The Examiner asserts that paragraph [0082] of *Subramaniam* discloses this feature of the claims. Office Action, pg. 7. *Subramaniam* provides no support for the Examiner's characterization of paragraph [0082]. Paragraph [0082] merely discloses that server programs in the system disclosed by *Subramaniam* can be designed to perform functions including "importing and exporting data, configuring the

database, executing workflow and process automation, [etc.]." Though paragraph [0082] discloses that server programs in the *Subramaniam* system may execute workflow and enforce business rules, paragraph [0082] does not disclose that the server programs select an icon in a graphical user interface according to a step of an automated workflow. Accordingly, paragraph [0082] fails to disclose the portions of claim 14 that recites "wherein one of the one or more icons is selected according to the corresponding step of the automated workflow."

Claim 14 as amended recites "a managed display having a task bar, wherein the task bar includes one or more icons for identifying managed applications, wherein a managed application is an application managed, at least in part, by an automated workflow." *Subramaniam* does not disclose this feature of claim 14 because *Subramaniam* does not disclose an icon associated with a "managed application." That is, *Subramaniam* does not disclose that an application can be managed by an automated workflow.

The Examiner argues that "displaying at least one icon corresponding to each one of the at least one managed applications" is disclosed by the icon tabs located at the top of the interface shown by Figure 26. Office Action, pg. 7. The Examiner's assertion, that the tabs "Service," "Activities," etc. are applications that are "each part of an automated workflow process containing unique individual forms and information to the agent" is entirely unsupported by *Subramaniam*. *Subramaniam* does not explain the purpose of the tabs illustrated by Figure 26. The "tabs" pointed to as disclosing icons corresponding to managed application by the Examiner appear to be functionality within a single application; however, this, like the Examiner's assertion, is speculation because *Subramaniam* does not disclose the purpose or function of these "tabs." Because *Subramaniam* does not expressly or impliedly disclose the "tabs" correspond to managed applications, and any explanation of the tabs by the Examiner is speculation, the tabs illustrated in Figure 26 cannot be relied upon to support this 35 U.S.C. § 102(e) rejection. *See* MPEP § 706.02(VI) (2006) ("for anticipation under 35 U.S.C. 102, the reference must teach every aspect of the claimed invention explicitly or impliedly") If upon further examination the Examiner believes that the aforementioned portion of claim 14 is disclosed by *Subramaniam*, Applicant respectfully requests that Examiner point out, with particularity, what in Figure 26 Examiner believes discloses an "icon" and what Examiner believes discloses "a managed application." *See* MPEP § 706.07

(2006) ("The examiner should never lose sight of the fact that in every case the applicant is entitled to a full and fair hearing, and that a clear issue between applicant and examiner should be developed . . . .").

2.   Claims 15-20

As discussed above, independent claim 14 is not anticipated by *Subramaniam*. Claims 15-20 depend from claim 14 and inherit every limitation of claim 14. It follows that *Subramaniam* does not anticipate dependent claims 15-20 at least because *Subramaniam* does not disclose the limitations of the claims 15-20 that are inherited from independent claim 14. The dependent claims also set forth subject matter making them patentable in their own right.

For example, claim 15 recites "wherein the managed application identified by the selected icon is displayed in a separate window." The Examiner asserts that this claim, as previously presented, is disclosed "in the toolbar" of *Subramaniam*, Figure 26. Office Action, pg. 8. Nothing in Figure 26, or the written explanations of Figure 26, discloses that a managed application is displayed in a separate window, as claimed by amended claim 15. *Subramaniam* does not disclose that any information, much less a managed application, is displayed outside of the "Basic Search View" and "Basic Search Results View" disclosed by Figure 26.

D.   **Claims 21-25**

1.   Claim 21

Claim 21 recites "wherein one of the one or more icons is selected according to the corresponding step of the automated workflow and the type of call indicated by the contact center control panel." The Examiner asserts that paragraph [0082], Figure 26, and paragraph [0072] of *Subramaniam* disclose this feature of the claim 21. Office Action, pg. 10. The cited portions of *Subramaniam* do not disclose an automated workflow, nor selecting an icon according to a step in a workflow and a type of call. Figure 26 merely discloses interfaces for accessing the searching capability of the application disclosed by *Subramaniam*. Neither Figure 26, nor the portions of *Subramaniam* explaining Figure 26 disclose that an icon is selected according to a step of an automated workflow and a call type. *See Subramaniam*, paras. [0162]-[0164].

Paragraph [0082] also fails to disclose "wherein one of the one or more icons is selected according to the corresponding step of the automated workflow and the type of call indicated by the contact center control panel." Paragraph [0082] merely discloses that server programs in the system disclosed by *Subramaniam* can be designed to perform functions including "importing and exporting data, configuring the database, executing workflow and process automation, [etc.]." Though paragraph [0082] discloses that server programs in the *Subramaniam* system may execute workflow and enforce business rules, paragraph [0082] does not disclose that the server programs select an icon in a graphical user interface according to a step of an automated workflow and a call type. Accordingly, paragraph [0082] fails to disclose the portions of claim 21 that recites "wherein one of the one or more icons is selected according to the corresponding step of the automated workflow and the type of call indicated by the contact center control panel."

Paragraph [0072] also fails to disclose the aforementioned portion of claim 21. Paragraph [0072] states that the user interface layer of *Subramaniam* may provide "applets, views, charts and reports, etc. associated with one or more applications" and supports various types of clients. *See Subramaniam*, para. [0072]. Paragraph [0072]'s brief summary of the user interface layer of *Subramaniam* does not disclose selecting an icon according to a step in an automated workflow and a type of call.

Claim 21 also recites "wherein the managed application identified by the selected icon is selectively displayed in a separate window." The Examiner asserts that this feature of claim 21 is disclosed by Figure 26. Office Action, pg. 10. Nothing in Figure 26, or the written explanations of Figure 26, discloses that a managed application is displayed in a separate window. *Subramaniam* does not disclose that any information, much less a managed application, is displayed outside of the window illustrated by Figure 26. Because *Subramaniam* fails to disclose the limitations of claim 21 in as complete detail as is in the claims, the rejection of claim 21 under 35 U.S.C. § 102(e) should be withdrawn.

2.   Claims 22-25

As discussed above, independent claim 21 is not anticipated by *Subramaniam*. Claims 22-25 depend from claim 21 and inherit every limitation of claim 21. It follows that

Subramaniam does not anticipate dependent claims 22-25 at least because *Subramaniam* does not disclose the limitations of claims 22-25 that are inherited from independent claim 21.

Claim 23 recites "wherein the input device is used to selectively input data into any one of the least one managed applications." The Examiner asserts the limitations of claim 23 are disclosed by *Subramaniam*, para. [0077]. Office Action, pg. 10. Paragraph 77 merely discloses that the multi-layered architecture employed by *Subramaniam* allows one or more software layers to reside on different machines. *See Subramaniam*, para. [0077]. Paragraph [0077] is silent as to whether these machines can be used to input data into managed applications. Accordingly, paragraph [0077] does not anticipate claim 23. *See* MPEP § 2131 (2006) ("A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.").

In rejecting claim 23, the Examiner also states that "it is commonly well known that interaction with a user interface has common input devices such as a mouse and/or keyboard among others." Office Action, pg. 10. Whether it is well known that interaction with a user interface has common input devices is irrelevant when determining whether *Subramaniam* anticipates claim 23 under 35 U.S.C. § 102(e). *See* MPEP § 2131 (2006) ("A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."). The aforementioned statement by the Examiner does nothing to explain how the limitations of claim 23 are disclosed by *Subramaniam*.

E.   Claims 26-29

1.   Claim 26

Rather than pointing out with particularity where in *Subramaniam* the features of claim 26 are disclosed, the Examiner states that the claim is disclosed in paragraphs [0008], [0009], [0014], [0082], and Figures 1-2. Claim 26 recites, in part, "automatically opening one or more applications on the agent's desktop suitable for aiding the agent in handling the call depending, at least in part, upon the one media type." Claim 26 also recites, in part, "automatically re-configuring the appearance of the graphical user interface as the agent follows steps of a pre-programmed call handling workflow." The 35 U.S.C. § 102(e)

rejection of claim 26 should be withdrawn, at least, because *Subramaniam* fails to disclose these limitations of claim 26.

Paragraphs [0008], [0009], and [0014] are included in the background section of *Subramaniam* and describe, generally, aspects of CRM applications and call centers. Paragraphs [0008] and [0009] explain that a CRM application may include tools that automate and streamline customer service, and that eBusiness applications are designed to allow organizations to create a single source of customer information that deliver customer support to various clients on multiple computing platforms. Paragraph [0014] merely discloses that call centers typically provide a consolidated view of the customer to ensure that call center agents have a complete knowledge of customer interactions. None of these three paragraphs disclose automatically opening one or more applications on the agent's desktop suitable for aiding the agent in handling a call. Nor do these paragraphs disclose automatically re-configuring the appearance of a graphical user interface.

Paragraph [0082] merely discloses that server programs in the system disclosed by *Subramaniam* can be designed to perform functions including "importing and exporting data, configuring the database, executing workflow and process automation, [etc.]." Although paragraph [0082] discloses that server programs in the *Subramaniam* system may execute workflow and enforce business rules, paragraph [0082] does not disclose a method for managing a graphical user interface that includes "automatically opening one or more applications on the agent's desktop." Likewise, paragraph [0082] does not disclose "automatically re-configuring the appearance of the graphical user interface."

The Examiner also points to Figures 1 and 2 as disclosing claim 26. Figures 1 and 2 disclose a multi-layered architecture and system components that can be included in a multi-layered architecture for the system described by *Subramaniam*. Nothing in Figures 1 or 2 relates to "automatically opening one or more application's on an agents desktop," or "automatically re-configuring the appearance of a graphical user interface."

If upon further examination the Examiner believes that claim 26 is disclosed by *Subramaniam*, Applicant respectfully requests that Examiner point out, with particularity, what in the cited portions of *Subramaniam* Examiner believes discloses a "automatically

opening one or more applications on the agent's desktop" and what Examiner believes discloses "automatically re-configuring the appearance of the graphical user interface as the agent follows steps of a pre-programmed call handling workflow." *See* MPEP § 706.07 (2006) ("The examiner should never lose sight of the fact that in every case the applicant is entitled to a full and fair hearing, and that a clear issue between applicant and examiner should be developed . . . .").

2.   Claims 27-29

Claims 27-29 depend from claim 26, and inherit every limitation of claim 26. It follows that *Subramaniam* does not anticipate dependent claims 27-29, at least because *Subramaniam* does not disclose the limitations of claims 27-29 that are inherited from independent claim 26. The dependent claims also present subject matter that makes them patentable in their own right.

For example, claim 27 recites "wherein automatically reconfiguring comprises automatically re-sizing one or more applications." The Examiner asserts that the limitations of claim 27 are disclosed by paragraph [0082] of *Subramaniam*. Office Action, pg. 12. Paragraph [0082] describes a server that handles incoming processing requests and monitors the state of all processes on the server. Paragraph [0082] also describes that this server runs server programs that may perform jobs including importing and exporting data, configuring the database, executing workflow and process automation, etc. Paragraph [0082] neither explicitly nor impliedly discloses that "automatically reconfiguring comprises automatically re-sizing one or more applications." Accordingly, *Subramaniam* does not anticipate claim 27 under 35 U.S.C. § 102(e).
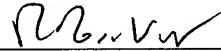
In rejecting claim 27, the Examiner asserts that the subject matter of claim 27 is "commonly well known in the art of window resizing in a windowing environment." Whether window resizing is well known in the art is irrelevant when determining whether *Subramaniam* anticipates claim 27 under 35 U.S.C. § 102(e). *See* MPEP § 2131 (2006) ("A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference."). *Subramaniam* does not anticipate claim 27 because the limitations of claim 27 are not expressly or inherently described by *Subramaniam*.
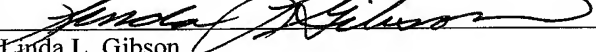
III.   CONCLUSION

In view of the above, Applicant believes the pending application is in condition for allowance. Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 06-2380, under Order No. 47524/P157US/10613152 from which the undersigned is authorized to draw.

Dated: March 12, 2008   Respectfully submitted,

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Date of Transmission: _____March 12, 2008_____